Respectfully submitted,

## UNITED STATES OF AMERICA DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

## UNITED STATES OF AMERICA v. SANTIAGO ET AL.

## DEFENDANT JOSE TORRADO'S MOTION FOR MODIFICATION OF THE CONDITIONS OF RELEASE AND WITHDRAWAL OF PREVIOUS MOTION

The defendant, JOSE TORRADO moves this honorable Court to modify the terms and conditions of his release, by eliminating the requirement of the third party custodian, his mother. The defendant will continue to be monitored by the electric bracelet, and will maintain his employment. (He is working full time for Atlantic Used Trucks and Salvage Corp. The employment has been approved by pretrial services. The \$25,000 surety will remain in effect.

The assistant United States Attorney, Denise Jefferson Caspar does not oppose this motion.

Chris Wylie, the pretrial supervisor for Torrado does not oppose these conditions.

WHEREFORE: The defendant prays that this Court grant the modification and that it be effective as soon as he finds an alternative place to live that is approved by pretrial services.

JOSE TORRADO By his attorney,	
•	D . 1.14 . 1.01 . 0.05
/s/ Lenore Glaser	Dated: March 21, 2005
Lenore Glaser, Esq.	
25 Kingston Street	
6th Floor	
Boston, MA 02111	
(617) 753-9988	
BBO #: 194220	